

GMR support this counterproposal. It does, however, require the modification in this proceeding of the authorization of one additional assignment, in order to accommodate the upgrades, and for resolution of the conflict. ~~Wood has acquired the consent of the permittee, whereby he consents at this time to the modification of its construction permit.~~

7. An alternate channel is available for Hogansville, Georgia, on which WEIZ can be relocated. This alternative channel will remove the mutual exclusivity between the GMR/DMI and the Greenville upgrade proposals. However, it requires that Channel 251A be removed from Valley, Alabama, and Channel 237A be put in its place. The specific proposal is outlined below. This request will enable WEIZ at Hogansville to operate on Channel 251 rather than Channel 239A. However, rather than allocate Channel 251A to Hogansville, Georgia, Wood requests that Channel 251C3 be allotted to Hogansville. Channel 251C3 is mutually exclusive with the present Channel 248A allotment at Hogansville, Georgia. GMR, DMI and Wood, therefore, request that Channel 237A be substituted for Channel 251A at Valley, Alabama, and that Pearce Broadcasting Partnership be ordered to change channels. Aside from the communities of Hogansville and Greenville, Georgia, and Valley, Alabama, the remaining aspects of the proposal originally forwarded by DMI and GMR (specifically, the change of community requests for Griffin to Fayetteville, and Sparta to Eatonton, and the Class A

substitution of channels at Ashland, Alabama, and Thomaston, Georgia,) should continue to be considered as previously filed. No changes in these requests are proposed in these comments.

RESULTS AND COUNTERPROPOSALS

8. Channel 251C3 can be substituted for Channel 248A at Hogansville, Georgia, at North Latitude 33° 09' 56" and West Longitude 85° 05' 11". This represents a site restriction of 16.0 kilometers west of the community in order to avoid shortspacing WSB-FM, Channel 253C, Atlanta, Georgia, and WAGH, Channel 252A, Fort Mitchell, Alabama. As demonstrated on Exhibit #1, Channel 251C3 from the reference site can provide city grade service (3.16 mV/m) to all of Hogansville, Georgia. Exhibit #2, a detailed spacing analysis for Channel 251C3 at Hogansville, which shows that aside from WUAF, Channel 251A, Valley, Alabama (who has been proposed to move to Channel 237A), that Channel 251C3 meets all Commission spacing requirements to all licensed, applied for or proposed facilities.

9. Channel 237A can be allocated to Valley, Alabama, at the coordinates specified in the outstanding WUAF construction permit at North Latitude 32° 55' 12" and West Longitude 85° 13' 04". While this represents a site restriction to accommodate the WUAF site, no actual

restriction is necessary. Coverage of Valley, Alabama, will be the same as authorized in the WUAF construction permit. Exhibit #3 is a detailed usable area study for Channel 237A at Valley, Alabama. Exhibit #4, likewise, shows that this channel, from the WUAF construction permit location, can meet the required spacing restrictions as a 6.0 kilowatt Class A facility, thus, potentially allowing WUAF to operate as a 6.0 kilowatt Class A, rather than as the authorized 3.0 kilowatt facility. These spacing requirements assume that the reference site for the Greenville C3 proposal on Channel 239A is slightly altered as outlined below.

10. Channel 239C3 can be allocated to Greenville, Georgia, at reference coordinates North Latitude 33° 01' 11" and West Longitude 84° 46' 06". From this location, a maximum C3 facility will provide Greenville with the requisite 3.16 mV/m contour. Demonstrated on Exhibit #5 is the area in which a transmitter site could potentially be located for Channel 239C3 at Greenville. Exhibit #6 is a detailed §73.207 spacing analysis which demonstrates compliance with §73.207, assuming the other changes proposed in these comments and in DMI & GMR's original requests are adopted.

11. By making these three changes at Hogansville and Greenville, Georgia, and Valley, Alabama, the requests filed by DMI, GMR and Orchon can all be accommodated. In addition,

it will also allow Wood to upgrade its facility at Hogansville to Class C3, without denying any of the requests in this current docket.

12. Therefore, the following changes are requested to §73.202(b) of the Commission's rules:

Fayetteville, Georgia

Present

None

Proposed

248C3

Griffin, Georgia

Present

249A

Proposed

None ¹

Eatonton, Georgia

Present

None

Proposed

249C3

Sparta, Georgia

Present

249A, 274A

Proposed

274A

1) AM station WKEU (co-owned with WQUL) and WHIE will remain licensed to Griffin, Georgia.

Hogansville, Georgia

Present

248A

Proposed

251C3

Greenville, Georgia

Present

239A

Proposed

239C3

Ashland, Alabama

Present

237A

Proposed

238A

Thomaston, Georgia

Present

237A

Proposed

266A

Valley, Alabama

Present

251A

Proposed

237A

13. Wood expresses its willingness to reimburse the permittee at Valley, Alabama, for reasonable expenses in making the channel change. ~~An agreement has been entered into with the permittee at Valley for its consent to the~~

channel ~~change~~. DMI & GMR have previously stated their willingness to reimburse the other impacted licensees and permittees in this proceeding.

PUBLIC INTEREST MATTER

14. As stated in its original Petition for Rule Making, the proposed upgrades at Griffin/Fayetteville and Sparta/Eatonton will enable WQUL and WSKS, combined, to provide service to 951,725 persons in 9,541.8 square kilometers, which represents an increase to their existing Class A facilities of 800,262 persons in 5,375.0 square kilometers. Additionally, it will enable WASZ in Ashland, Alabama, to operate as an equivalent 6.0 kilowatt facility, which provides 1.0 mV/m coverage to 20,376 persons in 2,275.3 square kilometers which is a potential increase of 7,108 persons in 612 square kilometers over its present Class A facility. ²

15. Once the channel substitution is made in Thomaston, Georgia, and WTGA-FM files its application, specifying its present Class A facility, ³ it will enable WTGA-FM to operate as a 6.0 kilowatt Class A facility, improving its potential population coverage within its 1.0 mV/m contour, to a total of 44,649 persons in 2,194.5 square

2. All population data extracted from PL 94-171 files (1990 Census).

3. WTGA-FM can operate as a 6.0 kilowatt non-directional facility at its present site under §73.215 regulations.

kilometers. This represents an increase of 9,907 persons in 613.2 square kilometers over the present Class A facility.

16. When Channel 239C3 is substituted for Channel 239A at Greenville, Georgia, the potential C3 facility will provide service to 146,735 persons in 4772.1 square kilometers. This represents an increase of 85,785 persons in 2,265.7 square kilometers over its presently authorized Class A construction permit. Additionally, when Channel 251C3 is allocated to Hogansville, Georgia, from the allocated reference site, a maximum C3 facility will provide 1.0 mV/m service to 111,408 persons in 4,787.1 square kilometers. This represents an increase of 51,932 persons in 2,959.5 square kilometers over the service presently provided from WEIZ operating as a 3.0 kilowatt Class A facility.

17. When Channel 237A is substituted for Channel 251A at Valley, Alabama, WUAF will be able to provide service to 90,172 persons in 2,044.7 square kilometers. This is an increase of 10,189 persons in 560.3 square kilometers over its presently authorized Class A facility.

18. Combining the overall gain figures from all of the potential upgrades, added to the expansion of service from 3.0 kilowatt Class A's to 6.0 Class A's in this proceeding, a total of 965,183 persons in 12,385.7 square kilometers will

receive service from the upgraded/changed facilities which potentially could be authorized by this proceeding. Thus, the improved service to this number of persons is clearly in the public interest.

19. Additionally, the provision of first local service to Fayetteville as proposed by DMI and first full-time local service to Eatonton as proposed by GMR, likewise, is in the public interest and would qualify under Priority 3 of the Commission's FM Assignment Criteria. While this proposal qualifies under Priority 4 for other matters, it, likewise, qualifies under Priority 3 for first local service. WQUL will continue to provide 1.0 mV/m service to Griffin, Georgia, once the upgraded facility begins service (Exhibit #7). The present WQUL Class A facility is currently unable to provide 1.0 mV/m service to Fayetteville, Georgia (Exhibit #8). Likewise, WSKS, operating on Channel 249C3 at Eatonton, Georgia, will provide greater than 1.0 mV/m service to Sparta (Exhibit #9). Presently, WSKS does not provide Eatonton with 1.0 mV/m service (Exhibit #10).

ALTERNATE PROPOSAL

20. As an alternate to the above noted resolution to conflicts, should the Commission consider the resolution not achievable, DMI and GMR restate their desire to follow

through on their original requests as outlined in its previous petition, incorporated herein by reference.

21. The approval of the original DMI and GMR requests can be made through the denial of the Orchon proposal at Greenville, Georgia. It has been shown that the Orchon proposal is mutually exclusive with the DMI/GMR requested substitution at Hogansville, Georgia. Thus, should the Hogansville channel exchange be precluded by a Greenville allotment, DMI and GMR's upgrade and change community of license requests would likewise be precluded.

22. The DMI and GMR upgrades will provide first local and first full-time local service (to Fayetteville and Eatonton, respectively) and, therefore, should be considered under both Priority 3 and Priority 4 of the Commission allotment criteria. The Orchon request is a mere upgrade of facilities, which does not provide any first or second full-time aural service. ³ This, therefore, places the Orchon request only into Category 4 (other public interest matters).

23. This alternative request places the DMI & GMR original request in a higher priority category than the Orchon proposal. Further, the original DMI & GMR request

3. The extra gain area covered by the potential Greenville C3 site is completely covered by stations WJSP, WFVJ, WYAI and WCQG.

will, when combined, provide expanded service to 826,390 persons in 7,270.8 square kilometer. ⁴ The original requested upgrade, as proposed by Orchon, would have provided service to 135,243 persons in 4,759.3 square kilometers. This represents an increase of 74,293 persons in 2,252.9 square kilometers over its present authorized construction permit.

24. When the figures are compared, the DMI/GMR requests will serve 111.2% more persons than the original Orchon proposal. This, when considered with the DMI/GMR request being a higher priority warrants a grant of the DMI/GMR proposals and the denial of the Orchon request.

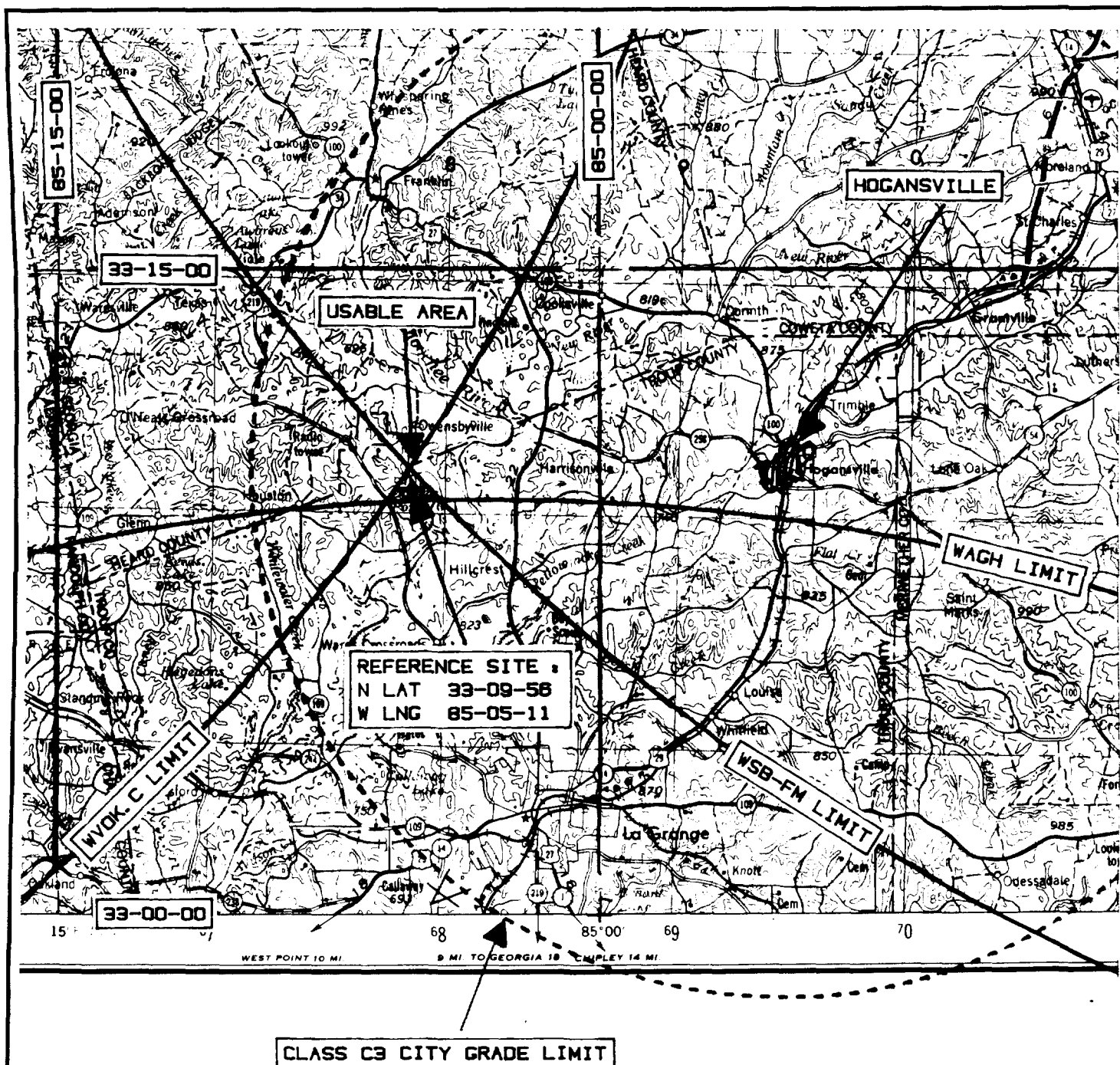
25. In the eventuality that the Commission adopts the above referenced resolution, DMI upon the allotment of Channel 248C3 to Fayetteville, Georgia, will file, on a timely basis, an application to make changes in the facilities of WQUL. Additionally, once Channel 249C3 is allotted to Eatonton, Georgia, GMR will file, on a timely basis, an application to make changes in the facilities of WSKS. Finally, should the Commission allot Channel 251C3 to Hogansville, Georgia, Wood will file, on a timely basis, an application to make changes in the facilities of WEIZ.

26. The foregoing technical statement and attached exhibits were prepared on behalf of Design Media, Inc., Good

4. The population figures have been adjusted by the additional gain figures of WTGA-FM.

Medicine Radio Georgia, Inc. and T. Wood and Associates, Inc., by Bromo Communications, Inc., their technical consultants. All information contained herein is true and accurate to the best of our belief and knowledge. Should questions arise during consideration of these comments, we welcome the opportunity to discuss the matter by phone at (912) 638-5608.

27. All the data used in the preparation of this report is based on the NTIA FM database as updated in December 1992. We assume no responsibility for omissions in that database, which may be adverse to the requests contained herein.



USABLE AREA CHANNEL 251C3

MAP IS A PORTION OF THE 1:250,000 SCALE ATLANTA U.S.G.S. EASTERN UNITED STATES MAP.

MAP ASSUMES THAT WUAF IS OPERATING ON CH 237A. ONLY THE MOST LIMITING STATIONS ARE DEPICTED ON THIS EXHIBIT.

EXHIBIT #1
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-227
DMI / GMR / WOOD
NUMEROUS COMMUNITIES IN
GEORGIA AND ALABAMA
December 1992

BROMO

COMMUNICATIONS

BROADCAST
TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.

ALLOCATION STUDY FOR HOGANSVILLE, GEORGIA
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE
33 09 56 N
85 05 11 W

CLASS C3
Current rules spacings
CHANNEL 251 - 98.1 MHz

DISPLAY DATES
DATA 11-25-92
SEARCH 12-10-92

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD251	251C3	Hogansville	GA	0.0	0.00	153.0	-153.00
	33 09 56	85 05 11	0.000 kW	OM	0.0	95.1	
T. Wood and Associates, Inc.							
* WUAF.C	251A	Valley	AL	204.3	29.87	142.0	-112.13
CP CN	32 55 12	85 13 04	3.000 kW	100M	18.6	88.3	
Pearce Broadcasting Partnersh > to Channel 237A DMI/GMR/Wood							
BPH900918MA							
DE248	248A	Hogansville	GA	132.6	16.48	42.0	-25.52
DE	33 03 54	84 57 23	0.000 kW	OM	10.2	26.1	
Good Medicine Radio, Ga. Inc.							
>PRM							
WEIZ.C	248A	Hogansville	GA	132.6	16.48	42.0	-25.52
CP CN	33 03 54	84 57 23	3.000 kW	100M	10.2	26.1	
T. Wood and Associates, Inc.							
BPH880531MN							
WVOK.C	250A	Oxford	AL	304.7	89.00	89.0	0.00
CPM CN	33 37 21	85 52 22	0.280 kW	330M	55.3	55.3	
Woodard Broadcasting Company,							
BMPH900711IB							
WSBFM	253C	Atlanta	GA	46.7	96.01	96.0	0.01
LI CN	33 45 35	84 20 07	100.000 kW	311M	59.7	59.7	
WSB, Inc.							
BLH880922KC							
WAGH	252A	Fort Mitchell	AL	177.9	89.02	89.0	0.02
LI CN	32 21.48	85 03 06	3.000 kW	100M	55.3	55.3	
Minority Radio Assoc., Inc. Ga							
BLH880112KA							
WAWV.A	252A	Sylacauga	AL	272.4	106.90	89.0	17.90
AP CN	33 12 23	86 13 54	3.700 kW	77M	66.4	55.3	
Action Comm. Enterprises, Inc							
BPH900827IE							
WAWV	252A	Sylacauga	AL	272.4	106.90	89.0	17.90
LI CN	33 12 23	86 13 54	2.700 kW	94M	66.4	55.3	
Action Comm. Enterprises, Inc							
BLH820827AD							
WBFM	251C	Seneca	SC	49.0	257.26	237.0	20.26
LI DCN	34 41 14	82 59 12	100.000 kW	306M	159.9	147.3	
Blue Ridge Broadcasting Co.,							
BLH900329KD							

ALLOCATION STUDY CHANNEL 251C3

* NOTE : THIS STUDY ASSUMES THAT WUAF
VALLEY, ALABAMA IS OPERATING
ON CHANNEL 237A.

EXHIBIT #2

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-227
DMI / GMR / WOOD
NUMEROUS COMMUNITIES IN
GEORGIA AND ALABAMA
December 1992

BROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
TECHNICAL CONSULTANTS

Washington, D.C.

ALLOCATION STUDY FOR VALLEY, ALABAMA
USING WUAF CP SITE/PROPOSED SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
32 55 12 N	Current rules spacings	DATA 11-25-92
85 13 04 W	CHANNEL 237 - 95.3 MHz	SEARCH 12-10-92

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-M1	R-KM R-M1	MARGIN (KM)
AD237	237A	Valley	AL	0.0	0.00	115.0	-115.00
	32 55 12	85 13 04	0 KW	OM	0.0	71.5	
	DMI/GMR/Wood						
* DE237	237A	Ashland	AL	306.1	73.01	115.0	-41.99
DE	33 18 30	85 50 58	0.000 KW	OM	45.4	71.5	
	Good Medicine Radio, Ga. Inc.						
* WASZ	237A	Ashland	AL	306.1	73.01	115.0	-41.99
LI CN	33 18 30	85 50 58	1.000 KW	165M	45.4	71.5	
	Perry Communications, Inc. BLH841106DP > to Channel 238A DMI/GMR						
* WTGAFM	237A	Thomaston	GA	94.8	74.96	115.0	-40.04
LI CN	32 51 49	84 25 10	3.000 KW	91M	46.6	71.5	
	Radio Georgia, Inc. BLH821118AL > to Channel 266A DMI/GMR						
* DE237	237A	Thomaston	GA	94.8	74.96	115.0	-40.04
DE	32 51 49	84 25 10	0.000 KW	OM	46.6	71.5	
	Good Medicine Radio, Ga. Inc.						
AD238	238A	Ashland	AL	306.1	73.01	72.0	1.01
AD	33 18 30	85 50 58	0.000 KW	OM	45.4	44.8	
	Good Medicine Radio, Ga. Inc.						
AD239	239C3	Greenville	GA	75.3	43.45	42.0	1.45
AD	33 01 11	84 46 06	0.000 KW	OM	27.0	26.1	
	DMI/GMR/Wood >Alternate site - restricted 5.2 km west-southwest						
WSTHFM	291C1	Alexander City	AL	232.7	29.43	22.0	7.43
LI CN	32 45 33	85 28 04	100.000 KW	299M	18.3	13.7	
	Solar Broadcasting Company, Inc. BLH860410KG						
CP239	239A	Greenville	GA	93.1	40.86	31.0	9.86
CP CN	32 54 00	84 46 54	6.000 KW	100M	25.4	19.3	
	Orchon Broadcasting Co., Inc. BPH901221MI						
WTVYFM	238C	Dothan	AL	181.3	184.73	165.0	19.73
LI CN	31 15 16	85 15 39	100.000 KW	323M	114.8	102.6	
	Woods Communications, Group BLH880323KD						

ALLOCATION STUDY CHANNEL 237A

* NOTE : STUDY ASSUMES THAT WASZ IS
OPERATING ON CHANNEL 238A.

STUDY ALSO ASSUMES THAT WTGA-FM
IS OPERATING ON CHANNEL 266A.

EXHIBIT #4

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-227
DMI / GMR / WOOD
NUMEROUS COMMUNITIES IN
GEORGIA AND ALABAMA

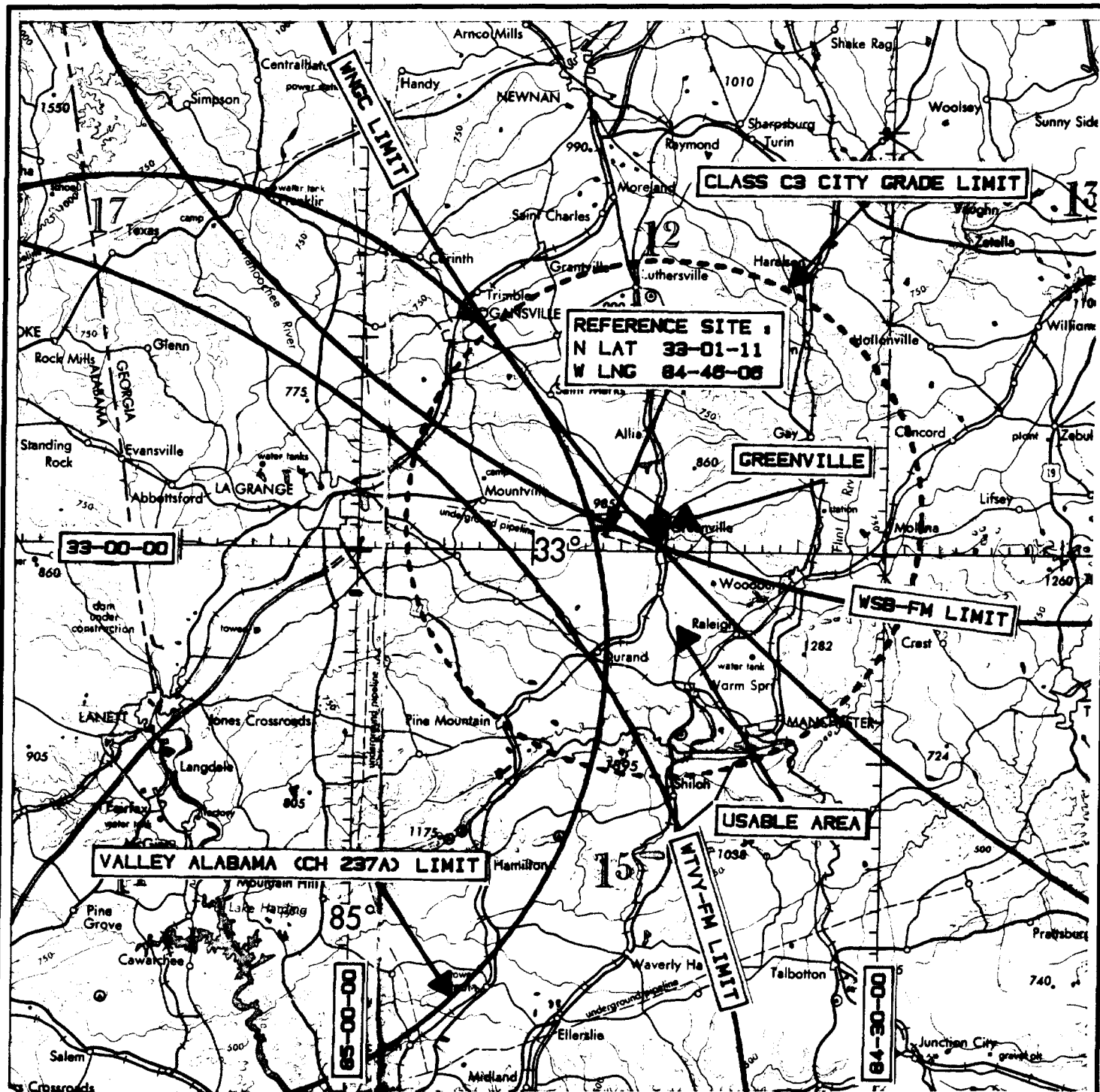
December 1992

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TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.



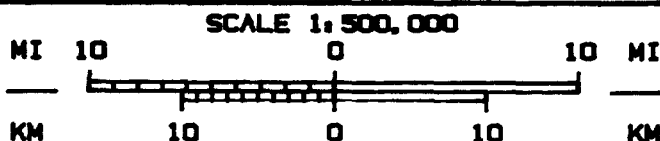
USABLE AREA CHANNEL 239C3

MAP IS A PORTION OF THE 1:500,000 SCALE ATLANTA SECTIONAL AERONAUTICAL CHART.

MAP ASSUMES THAT WTGA IS OPERATING ON CHANNEL 288A. ONLY THE MOST LIMITING STATIONS ARE DEPICTED ON THIS EXHIBIT.

EXHIBIT #5
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-227
DMI / GMR / WOOD
NUMEROUS COMMUNITIES IN
GEORGIA AND ALABAMA

December 1992



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 St Simons Island, Georgia
 Washington, D.C.

ALLOCATION STUDY FOR GREENVILLE, GEORGIA
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C3	DISPLAY DATES
33 01 11 N	Current rules spacings	DATA 11-25-92
84 46 06 W	CHANNEL 239 - 95.7 MHz	SEARCH 12-10-92

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-M1	R-KM R-M1	MARGIN (KM)
AD239	239C3	Greenville	GA	0.0	0.00	153.0	-153.00
AD	33 01 11	84 46 06	0.000 kW	OM	0.0	95.1	
GMR/DMI/Wood							
>PRM-Alternate site-restricted 5.2 km west-southwest							
AP239	239A	Greenville	GA	275.7	8.69	142.0	-133.31
AP CN	33 01 39	84 51 39	1.350 kW	211M	5.4	88.3	
Orchon Broadcasting Co., Inc. BMPH920811ID							
DE239	239A	Greenville	GA	185.4	13.34	142.0	-128.66
DE	32 54 00	84 46 54	0.000 kW	OM	8.3	88.3	
Orchon Broadcasting Co., Inc.							
CP239	239A	Greenville	GA	185.4	13.34	142.0	-128.66
CP CN	32 54 00	84 46 54	6.000 kW	100M	8.3	88.3	
Orchon Broadcasting Co., Inc. BPH901221MI							
* DE237	237A	Thomaston	GA	118.0	36.94	42.0	-5.06
DE	32 51 49	84 25 10	0.000 kW	OM	23.0	26.1	
Good Medicine Radio, Ga. Inc.							
* WTGAFM	237A	Thomaston	GA	118.0	36.94	42.0	-5.06
LI CN	32 51 49	84 25 10	3.000 kW	91M	23.0	26.1	
Radio Georgia, Inc. BLH821118AL							
> to Channel 266A DMI/GMR/Wood							
WKLS	241C	Atlanta	GA	24.5	96.01	96.0	0.01
LI CY	33 48 27	84 20 26	100.000 kW	300M	59.7	59.7	
Great American TV & Radio Co. BLH880104KC							
AD237	237A	Valley	AL	255.3	43.45	42.0	1.45
AD	32 55 12	85 13 04	0.000 kW	OM	26.9	26.1	
GMR/DMI/Wood							
WNGC	238C	Athens	GA	48.7	178.83	176.0	2.83
LI CN	34 05 02	83 19 18	100.000 kW	386M	111.1	109.4	
Clake Broadcasting Corporatio BLH840124AB							
WBILFM	240A	Tuskegee	AL	231.2	96.98	89.0	7.98
CP CN	32 28 17	85 34 28	4.300 kW	115M	60.3	55.3	
New World Communications, Inc BPH910624IC							

ALLOCATION STUDY CHANNEL 239C3

* NOTE : STUDY ASSUMES THAT WTGA IS
OPERATING ON CHANNEL 266A.

EXHIBIT #6

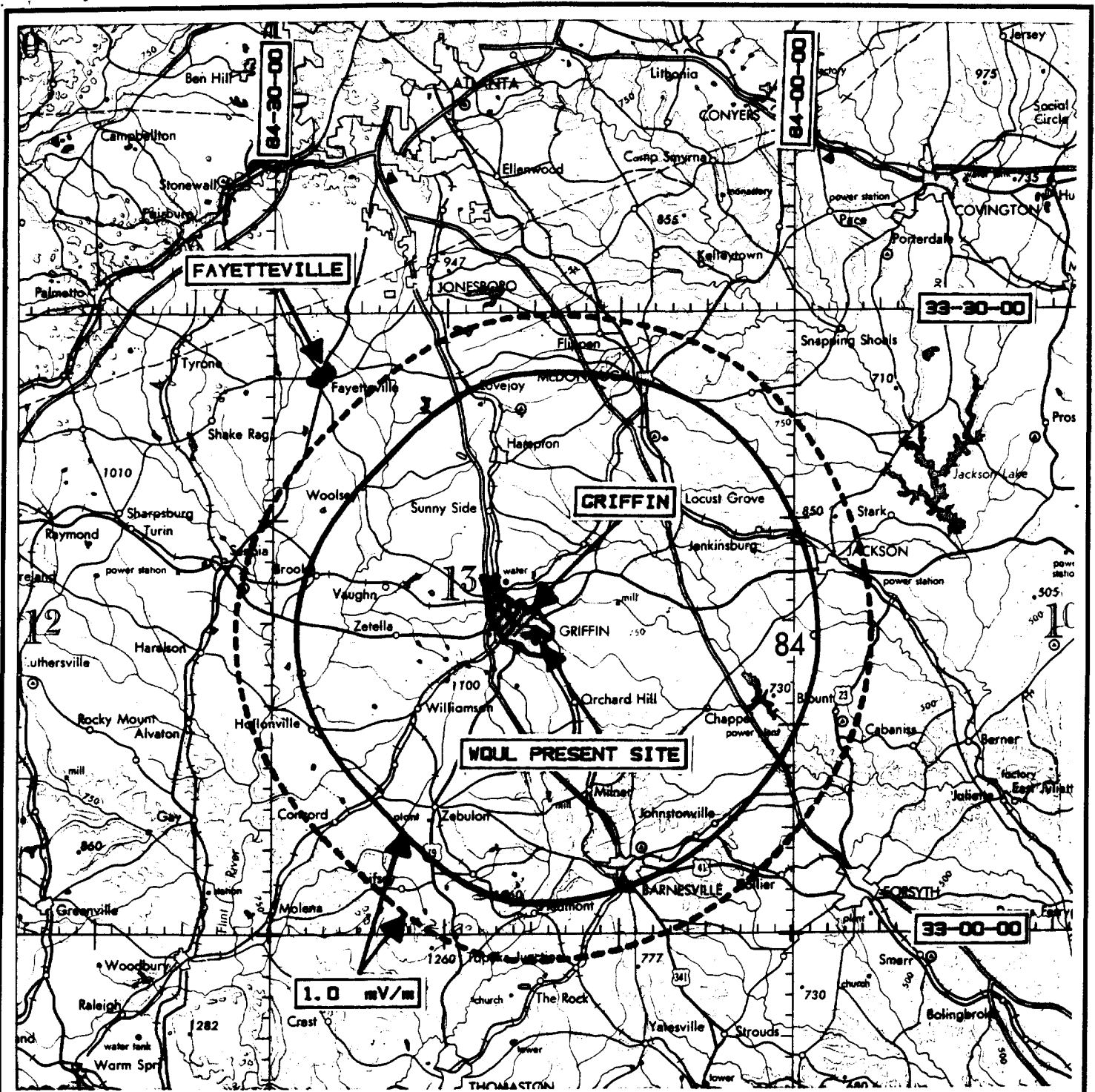
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-227
DMI / GMR / WOOD
NUMEROUS COMMUNITIES IN
GEORGIA AND ALABAMA
December 1992

BROMO
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St Simons Island, Georgia

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Washington, D.C.

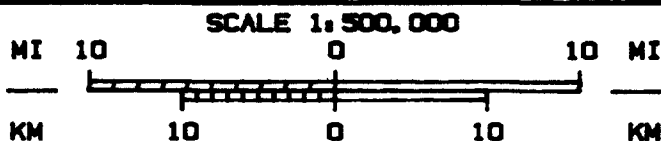


PREDICTED CONTOURS

MAP IS A PORTION OF THE 1:500,000 SCALE ATLANTA SECTIONAL AERONAUTICAL CHART.

DASHED LINES REPRESENT APPLIED FOR 6.0 KW CONTOURS OF WOL.

EXHIBIT #8
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-227
DMI / GMR / WOOD
NUMEROUS COMMUNITIES IN
GEORGIA AND ALABAMA
December 1992

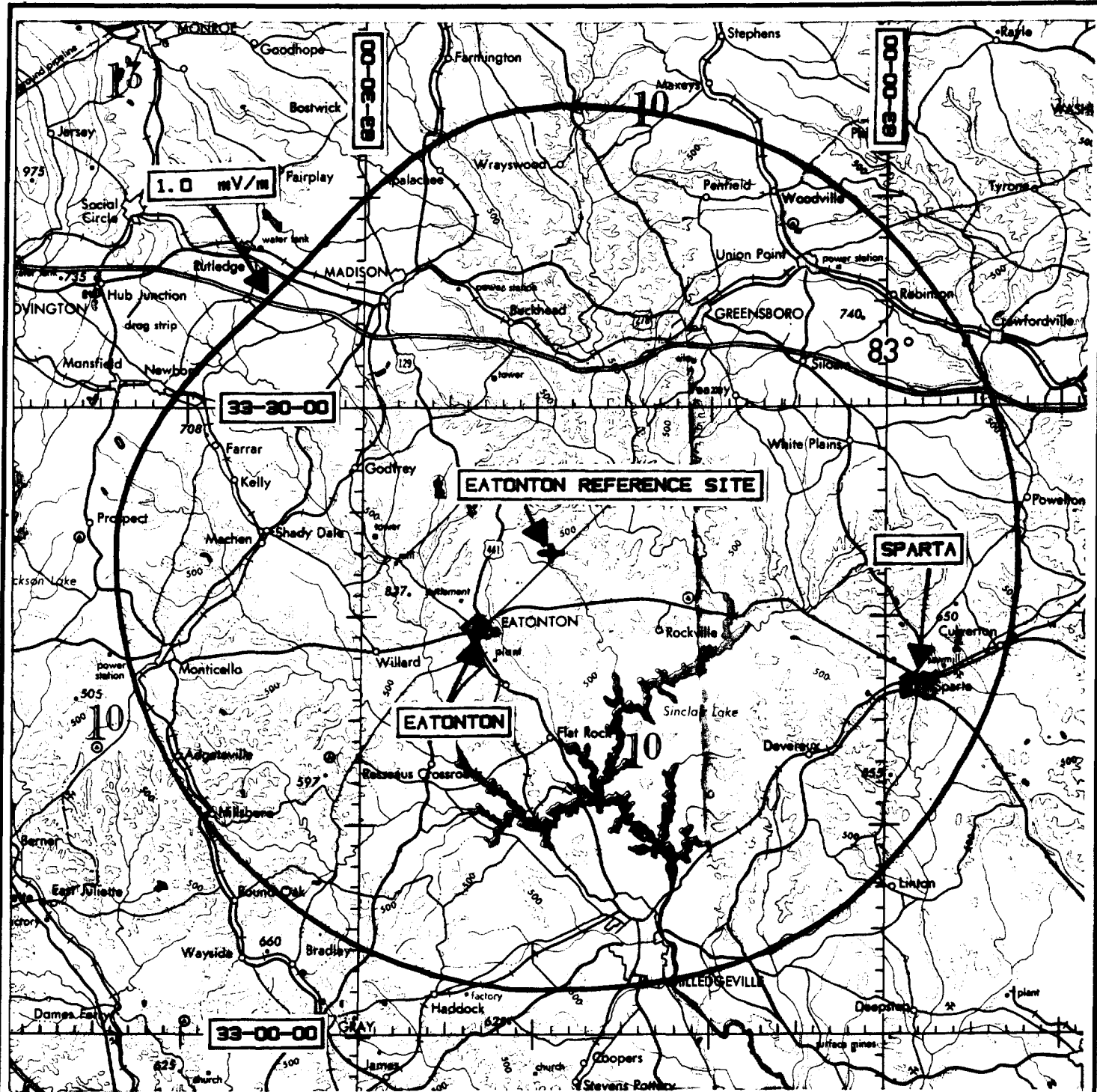


BROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
 TECHNICAL CONSULTANTS

Washington, D.C.



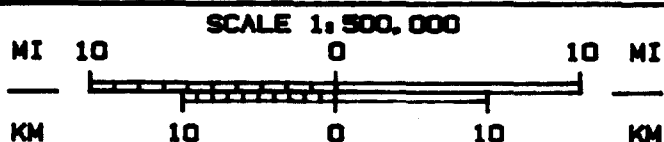
PREDICTED CONTOUR

MAP IS A PORTION OF THE 1:500,000 SCALE
ATLANTA SECTIONAL AERONAUTICAL CHART.

EXHIBIT #9

COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-227
DMI / GMR / WOOD
NUMEROUS COMMUNITIES IN
GEORGIA AND ALABAMA

December 1992

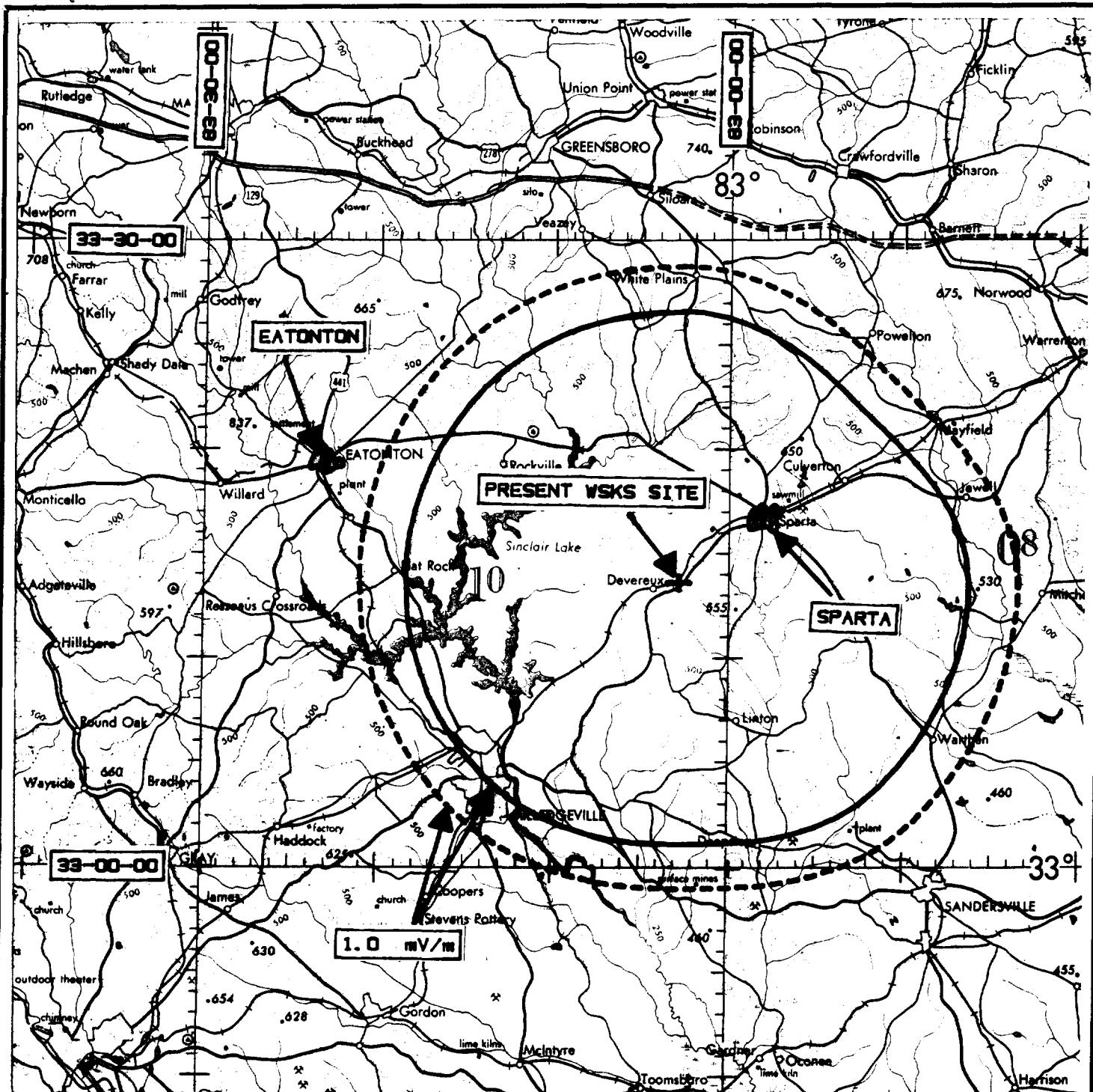


BROMO
COMMUNICATIONS

St Simons Island, Georgia

BROADCAST
TECHNICAL CONSULTANTS

Washington, D.C.



PREDICTED CONTOURS

MAP IS A PORTION OF THE 1:500,000 SCALE ATLANTA SECTIONAL AERONAUTICAL CHART.

DASHED LINES REPRESENT APPLIED FOR 6.0 KW CONTOURS OF WSKS.

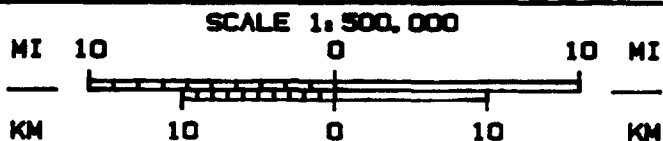


EXHIBIT #10
COMMENTS & COUNTERPROPOSAL
MM DOCKET # 92-227
DMI / GMR / WOOD
NUMEROUS COMMUNITIES IN
GEORGIA AND ALABAMA
December 1992

BROMO
COMMUNICATIONS
 BROADCAST TECHNICAL CONSULTANTS
 St Simons Island, Georgia Washington, D.C.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

State of Georgia)
St. Simons Island)
County of Glynn)
 ss:

JEFFERSON G. BROCK being duly sworn, deposes and says that he is an officer of Bromo Communications, Inc. Bromo has been engaged by Design Media, Inc., licensee of WQUL, Good Medicine Radio Georgia, Inc., licensee of WSKS, and T. Wood and Associates, Inc., permittee of WEIZ, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.


The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 11th day of December, 1992.



Jefferson G. Brock
Affiant

Sworn to and subscribed before
me this the 11th day of December, 1992.

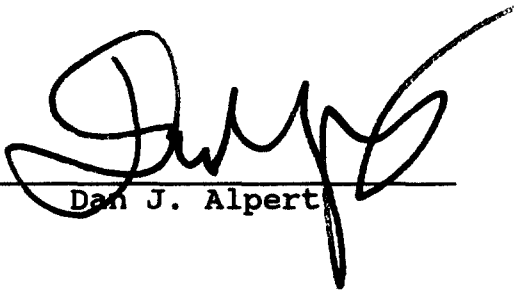


Notary Public, State of Georgia
My Commission Expires: September 8, 1995

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that I have served a true and correct copy of the foregoing document to the following person:

Robert S. Stone, Esq.
McC Campbell & Young, P.C.
2021 Plaza Tower
P.O. Box 550
Knoxville, TN 37901-0550



Handwritten signature of Dan J. Alpert, written in black ink, positioned above a horizontal line.

Dan J. Alpert